

EXHIBIT 3



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Securities Class Action Claims Administration

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Industry
observers
predicted
a



downward trend in the filing of securities class action cases after the U.S. Congress passed the Private Securities Litigation Reform Act of 1995. Recent statistics reveal plaintiffs filed more than 750 federal

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securities class actions in the first six months of 2016, and that pace continued at near-record levels through the following 24 months.

The magnitude of the dollar losses claimed in these lawsuits hints at the complexity of securities class action cases and the many challenges attorneys face in the settlement administration. Heffler Claims Group is uniquely positioned to manage and administer securities class action settlements for securities litigation involving common or preferred stock, notes, bonds, initial public offerings (IPOs), put-and-call actions, ADRs, and exchange-traded funds (ETFs).

Heffler: First Company to Administer a Securities Class Action Settlement

In 1974, Heffler became the first company to administer a Securities Class Action Case when we handled the notice and administration of the Atlantic Department Stores class action lawsuit. Since then, we have administered more than 400 cases and are considered among the industry's most experienced. Many of the processes and procedures we created with that first case are still used in Securities class action matters today, and we continue to innovate with industry-leading technology.

A Complete In-House Team to Administer Securities Class Action Settlements and Damage Awards

At Heffler, we don't rely on third-party services for the financial, tax, audit, and accounting analysis required to administer a securities class action settlement. Our in-house staff has the experience and skills required to develop settlement fund distribution algorithms, to draft plans of allocation and to confirm and verify claim validity before any settlement funds are distributed. Our team also includes tax professionals who monitor the tax impacts of transactions under Section 468(B) of the Internal Revenue Code.

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Advanced Notice Practices for Securities Class Action Administration

Layers of confidentiality make reaching class members in securities class actions challenging. Heffler Claims Group maintains a proprietary database of brokers, financial institutions, transfer agents, and other professional entities to reach securities shareholders in a timely and efficient manner. Further, HF Media, our in-house media company and the most experienced legal notice team in the class action industry, is able to develop customized notice programs for each securities class action settlement. Additionally, our team is uniquely skilled at communicating with various compliance departments to ensure compliance with all parties involved.

Proprietary Technology Enhances Administration and Distribution

Securities class action cases often present many obstacles when it comes to administering notices and contacting prospective class members. Our industry knowledge and state-of-the-art technology enable communication with shareholders while ensuring full compliance with all aspects of the case.

We manage class member communication through our in-house contact center, providing customized single or multi-lingual support for each case and the capacity to handle up to 10,000 calls per day. Depending on the case requirements, we provide professionally trained live agents and a cost-effective, 24/7 interactive voice response (IVR) service.

Our Enhanced Fraud Control Weeds Out Suspicious Securities Claims

Heffler uses advanced fraud control processes in the administration of all securities class action settlements to reduce fraudulent claims

and fraudulent distribution checks. Our sophisticated processes are designed to meet stringent industry standards, mitigate risk, comply with security and processing integrity, protect confidentiality, and adhere to privacy principles in the American Institute of Certified Public Accountants (AICPA) Trust Services Criteria.

Heffler Claims Group has Unparalleled Securities Class Action Claims Experience

Over the past 50 years, our team has administered hundreds of sophisticated securities class settlements and awards. With each new matter and at every stage of our growth, we continue adding industry-leading technology and services to improve our claims administration process.

Our securities class action experience includes:

In *American Business Financial Services, Inc. Noteholders Litigation*, we issued notices to more than 29,000 prospective class members and distributed more than \$11.8 million to over 14,500 verified class claimants.

In the *KLA-Tencor Securities Litigation* case, we arranged a mailing of more than 381,000 notices and administered a \$65 million settlement fund. We distributed payments to more than 11,600 claimants pursuant to a complex plan of allocation that calculated losses as a function of holding periods for the securities at issue.

In the *Schering-Plough Securities Litigation*, we received more than 71,000 proof of claims, a majority of which were filed or processed electronically by large institutions or nominees, conducted extensive audits to verify proper calculation of claims, and distributed damages awards to class claimants from a \$165 million settlement fund.

The volume and complexity of securities class action cases is on an upward trend. Almost 150 cases in 2017 settled, with an average settlement of \$25 million. Our securities class action administration

team tracks these trends to provide best-in-class settlement administration services.

Call Heffler Claims Group for Professional Administration of your Securities Class Action Settlements

Heffler Claims Group provides unparalleled securities class action settlement administration services. Our dedicated team understands the nuances of securities litigation and can help prevent potential problems before they occur. We efficiently administer a settlement for any type of securities investment, any class size, and any dollar value.

[Contact Heffler Claims Group](#) to schedule a complimentary consultation for your complex securities class action matter.

Featured Case Studies

American Business Financial Services, Inc.

KLA – Tencor Corporation

Schering-Plough Corporation

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Have a question about a specific case or need a proposal?

 **We'll be in touch within 24 hours**

We look forward to connecting with you! If you are a class member or potential class member inquiring about a class action settlement, please visit our [active cases page](#). Case specific class member inquiries are not answered through this form.

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Active Cases

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First name

Last name

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Attorney Referral ▼



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If you are a Class Member inquiring about a specific case, please visit the settlement website or utilize the settlement email address or toll-free phone number if applicable.

Class Member inquiries submitted via this form WILL NOT receive a response.

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